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FFR 12 2014 FCC Mail Room

Annual CPNI Compliance Certificate EB Docket 06-36 Filer ID 826998 FRN 0015949969

February 5, 2014

Attention:

Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, SW Suite TW-A325

Washington, DC 20554

Enclosed:

**CPNI** Certification Letter

CPNI Attachment

CPNI, Internal Policy and Procedures

Distribution: (4 each) Marlene H. Dortch, Office of the Secretary, Federal

Communications Commission, 445 12th Street, SW, Suite TW-A325,

Washington, DC 20554

(2 each) Federal Communications Commission, Enforcement Bureau,

Telecommunications Consumers Division, 445 12th Street, SW.

Washington, DC 20554

(1 each) Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402,

Washington, DC 20554

Comment:

Please advise if further information is required for CPNI compliance.

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Annual 47 C.F.R. S: 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 5, 2014

Name of company covered by this certification: OneStream Networks, LLC

Form 499 Filer ID: 826998

Name of signatory: Aubrey D. Smith

Title of signatory: President

I, Aubrey D. Smith, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules [ATTACHED/ENCLOSED].

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

Aubrey D. Smith III (Trey)

President
OneStream Networks LLC
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585-563-1851
tsmith@onestreamnetworks.com



# Customer Proprietary Network Information (CPNI) Policy and Procedures

# February 2014

# Customer Service and Reception:

- 1. Assign a ticket to any "request for information" for archival and tracking purposes
- Do Not dispense or deliver any customer information directly to the requestor, unless a
  unique and specific password has been established for this purpose that clearly identifies
  the requestor as an authorized recipient of the information requested; otherwise:
- 3. USPS mail any requested information to the billing address and contact of record, or
- 4. place a call to the contact of record at the telephone number of record (only) to deliver the information (then email securely and confidentially), or
- 5. the requestor may come into OneStream Networks' offices with valid company ID
- 6. Document every such transaction separately in the "regulatory" repository
- Never disclose names, addresses, telephone numbers, CDRs, or any other customerspecific details directly over the phone.
- Seek advice from management if you are unsure of how to process any request for information
- 9. Failure to comply and adhere to this policy could result in disciplinary action

# Awareness of Data Brokering and Pretexting:

Immediately report any instance of suspicious activity that appears to be in the form of an unauthorized request for information. If possible, capture all relevant information, including: Time, Date, Originating Telephone Number, Name, and Information requested.

Report this information immediately to OneStream Networks Legal Department on the internally-provided CPNI breach reporting form.

### Customer Self-service:

All self-service portals are password protected and require user name/password authentication for access.

CDRs may be retrieved by the customer from a secure, password-protected FTP site or converted to CD and mailed to the address of record/contact of record.

At this point, OneStream Networks does not permit external access to any billing information or customer databases.

### Use of Customer Information for Marketing:

OneStream Networks does not use any customer information for marketing purposes without written consent from the customer contact of record.

### Invoice Message:

OneStream Networks provides the following information on customer invoices:

"Consistent with FCC regulation, OneStream Networks protects customer proprietary information and shall not release information without verification or authentication of the requestor, following strict practices authorized by the FCC. OneStream Networks will not utilize any customer information for marketing purposes without the expressed written consent of the customer."